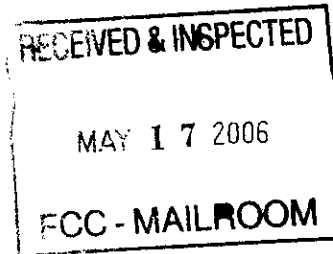




*CGB-CC-0526*  
Channel of Love Ministries

**Joan and Marty Pearce**  
PO Box 3007  
Redding, CA 96099  
**530-357-4711**  
[www.joanpearce.org](http://www.joanpearce.org)



Now's the Time



May 12, 2006

Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
Attention: CGB Room 3-B431  
445 12th Street SW  
Washington, DC 20554

To Whom It May Concern:

Enclosed, please find our petition for Exemption to the Closed Captioning Requirements on the Basis of Undue Burden (79.1(f)) as well as attachments 1-5, Including Captioning Cost Quotes, Letter from our editor/programmer, Financial Statements and other Financial back-up.

We pray that you will take our petition into consideration and grant us exemption status.

Sincerely,

*Joan L Pearce*

Reverend Joan L. Pearce  
President/Owner of Channel of Love Ministries

*The whole miss world is wise Proverbs 11:30*

**Petition for Exemption to the Closed Captioning Requirements  
On the Basis of Undue Burden**

RECEIVED & INSPECTED

MAY 17 2006

FCC - MAILROOM

**Introduction:**

Now is the Time For Miracles is a weekly religious television program which is produced by Channel of Love Ministries International. It broadcast on Sky Angel weekly, airing on Monday at midnight. It primarily contains teaching and testimonies on issues of life. We have an 800 number that viewers can call in for prayer and to receive Jesus.

**Nature and cost of closed captioning:**

Adding closed captioning to our video shows would be a financial burden upon our small ministry.

*To send out for captioning:* We have looked into the cost of sending our tapes to a closed captioning service, enclosed are some prices from Custom Captions, Talking Type, and Computer Prompting and Captioning Co. (**Attached Price quotes, attachments 1, 2, and 3**) The least of these services would cost \$275.00 per show plus postage expenses from and back to our editing service for proofing and then to the TV station. In addition to the high expense, captioning would also create a delay in getting the program to the TV station in a timely manner as is required by Sky Angel, which is already difficult now.

*To provide closed captioning in-house:* This would not be an option for our ministry for several reasons. 1) My husband takes the camera's to where we are ministering and solicits volunteers to run the cameras 2) We do not have a facility of our own or any equipment other than the cameras 3) We send our tapes to FLTIM Production Studio where Diane Johnson edits and finishes the shows to completion 4) FLTIM Production Studio does not have the necessary equipment and can not afford the equipment for captioning. (**See attached Letter, attachment 4**) 5) To bring it in-house would require renting a facility, buying all the necessary equipment, and hiring someone who can edit and caption to be on staff at that facility. All of this would be out of our reach financially.

**Impact on the operation of the program owner:**

Now is the Time for Miracles production expenses are: Editing and Production \$150.00 per show, Shipping to editor and from editor to Sky Angel \$50.00 per show, Plus cost of tapes for camera and for Beta tapes for TV station \$30.00 a show. That is approximately \$230.00 per show (**refer to attachment 4**) To add closed captioning to the program would be an additional production fee of a minimum of \$275.00 plus an extra \$25.00 in shipping fees for an additional cost of \$300.00 per show. That would be an additional cost \$15,600.00 annually. Our production cost now are \$11,960.00 so to add closed captioning would more than double our production cost and be an obvious hardship on our small ministry and would force us off the air.

**Financial Resources of the program owner:**

Now is the Time for Miracles is not an income producing show. In fact Channel of Love Ministries International is supporting the show through outside donations from individuals and church offerings where we do ministering. Even our camera equipment was donated to us as a love gift years ago. All of our income comes from contributions from individuals. Attached are Channel of Love's 2005 financial reports. (**attachment 5 Pages 1-5**). We had a net income of \$2,333.04 for the year but actually we had a loss of \$23,635.71 because the owner loaned money to the ministry in the amount of \$25,968.73 (see pg 3-4) which they got from sale of personal real estate and belongings. It is not something it can repeatedly do. As you can see the owner takes only a very small salary. Also, it shows television expenses as \$14,576.58 but nearly all of our UPS expenses under postage are for TV related production expenses as well. (See pg 5)

**The type of operations of the program owner:**

Channel of Love Ministries International has many types of ministries, all with a goal of reaching the less fortunate, helping people with food and clothes, and assisting people who are hurting in their daily lives, where we bring them hope and encouragement and share with them the love of Jesus. One of our ministries is providing Tent Meetings, Outreaches, and Missionary work, where we preach Jesus and give out food, clothing and toys etc. Another ministry is our TV program "Now is the Time for Miracles" where we share issues of life and teach the gospel of Jesus. The purpose of the program is to save souls and to provide a crises/prayer line via an 800 number, where viewers can call in for prayer and receive free literature. We minister in churches, prisons, shut-ins, nursing homes and senior citizen facilities. We also teach and train people to go on Mission Trips and take small groups into the mission fields so they can be used of God.

**Other relevant factors:**

According to (47 C.F.R. § 79.1 (d) 11) **Captioning expenses is excess of 2% of gross revenues.** No video programming provider shall be required to expend any money to caption any video programming if such expenditure would exceed 2% of the gross revenues received from that channel during the previous calendar year. Our gross revenue was \$127,878.28, 2% of that is \$2,558.00. At an additional cost of \$300 per show, 4 times a month, it would take just over two months to reach that amount.

We have phone lines with about 18 volunteers to answer calls from the TV show. We greatly desire to remain on the air because of the number of people we are having an impact on. Our desire is so great that we are willing to financially help support the Television Ministry even at our own expense whenever possible.

**Conclusion**

At this time the air time is given to us free by Sky Angel, but the production and support cost associated with the Television Ministry are extremely expensive for our budget and to add closed captioning at this time would cause an undue burden and force us to go off the air. Please consider our request to be granted exemption to the closed captioning of our show "Now is the Time for Miracles."



## Attachment 1

## Rates

**How Much Will It Cost**

For creating the captions, we have an unbelievable rate of...

**Roll-Up: \$3.00 per Minute**

**Pop-Up: \$4.00 per Minute**

Sample rates for shows:

Duration 30 minutes for Roll-Up captioning:

**Roll-Up**

Transcription	\$ 60.00
Cost of creating a captioning file (bulk of the work)	\$ 90.00
Encoding	\$125.00
<b>Total:</b>	<b>\$275.00</b>

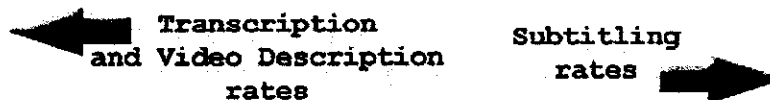
**Pop-On**

Transcription	\$ 60.00
30 minutes of pop-on captioning @\$4.00 per minute	\$120.00
Encoding	\$125.00
<b>Total:</b>	<b>\$305.00</b>

If you are set up for encoding yourself then we will only charge you the cost of creating the caption file.

**Important:**

With closed captioning, time is of the essence. We encourage you to involve us with the project in the early stages of production. When you reach your fine cut, please send us a vhs copy with a VITC or an LTC time code. We'd like to get started on the close caption right away. Nevermind the changes that will happen between the fine cut and the master. We'll incorporate those to the closed captions without any extra cost as long as you let us know what and where they are (unless you completely overhaul the program in a major way). Our costs with captioning are heavily dependent on the turn-around time.





Computer Prompting and Captioning Co.

1-800-977-6678 | info@cpcweb.com

Home

Captioning  
Teleprompting  
Subtitling  
DVD  
Webtv  
V-Chip  
Webcasting

Realtime Live

Post-Production

Audio Description

DVD

Realtime Live

Video-On-Demand

## Post Production Captioning/ Subtitling Attachment 2

**Click here for the Order Form**

### Satisfaction Guarantee

CPC provides a free approval copy to guarantee satisfaction.

### Quality

Top quality captioning is our highest priority. It is achieved by:

- State-of-the-art software
- Experienced, highly trained captioners
- Teamwork of captioners & software developers
- 15 years of experience
- Triple quality control

### Video Media

- **Videotape:** All formats from VHS to Digital Betacam
- **DVD:** Caption and subtitle files for most major DVD authoring systems
- **Webcast:** Video-on-Demand

### Specials

- Major discounts for bulk work
- Extreme discounts to caption Webcasts of previously captioned videos.

### Transcription & Translation

Professional Transcription and translation to most major languages available at competitive price.

### Languages

**Closed & Open Captioning**

English, Spanish, French, Portuguese, Dutch, German and Italian

### Subtitling

English, plus all Eastern and Western European languages. Unlimited language

### Caption/Subtitle Rates Made Simple

**Pop-on mode:** \$7/min. of video  
+ \$150 setup fee

**Roll-up mode:** \$5/min. of video  
+ \$150 setup fee

(You provide transcript & blank tape)

.....  
Add \$3/min. of video if CPC  
transcribes.

### Special Bulk Rate for VHS Tapes - \$6.00/Minute

For any VHS job over 5 hours,  
CPC has a great price of  
\$6.00/min. of video. You  
provide the video, we  
transcribe and caption it in the  
Roll-up mode.

### Retrieve/Convert Captions Between Different Formats

- Webcasting with Captions
- DVD Captioning/Subtitling

**Click here for rates and details  
of all file formats supported**

### Sample Video w/ Captions

Sample Video captioned for the Web

DSL/Cable users: **Click here;**

56K users: **Click here**

## Attachment 3

We want to be your captioning and subtitling provider.

We provide the highest quality captioning and subtitling at easy-to-understand low rates.

Many captioning services quote enticingly low price-per-minute rates then tack on additional charges. Total costs escalate as charges are added for transcriptions, set-up fees, tape costs, and mailing fees.

We charge a flat rate per minute of video time, which includes all costs. Multiply our rate by number of minutes in your video to calculate your final cost.

#### PRICE LIST

##### **Closed Captioning - Roll-Up**

\$10.00/minute - 60+ minutes  
\$12.00/minute - less than 60 minutes

##### **Closed Captioning/Subtitling - Pop-On**

\$15/minute - 30+ minutes  
\$20/minute - less than 30 minutes

##### **Open Captioning - Pop-On** (There is no black box around captions.)

\$15/minute - 30+ minutes  
\$20/minute - less than 30 minutes

##### **Pricing Includes:**

Formatted captions  
Script transcription or verification  
Punctuation review  
Electronic copy of proof script  
Synchronized captioning

Electronic reading speed check  
Complimentary VHS proof copy  
Return mailing costs  
Final master or formatting

##### **You Provide:**

finished Betacam or DigiBeta  
master with continuous time code

##### **You Receive:**

your original plus Betacam or  
DigiBeta encoded master or  
compatible authoring file

media file for DVD/webcasts

compatible formatting  
and authoring file

VHS copy of the master with

SVHS or VHS captioned video

# Faith Life Tabernacle



Pastor Barbara Reis  
Post Office Box 25568 • Richmond, Virginia 23260

Attachment 4

May 13, 2006

To Whom It May Concern:

I, Diane Johnson, edit and produce Channel of Love Ministries television show "Now is the Time for Miracles." All work is done at FLT/M Production Studio, which is located at Faith Life Tabernacle International Ministries in Richmond, VA, on a voluntary basis. We currently use the Velocity Non Linear System.

We looked into the cost of adding closed caption equipment to our system and found it to be too costly at this time as well as having insufficient staffing to run it.

FLT/M Production Studio currently receives \$150.00 per show from Channel of Love Ministries. Channel of Love provides their own tapes and pays for the shipping of all programs.

The station, Sky Angel, who airs "Now is the Time for Miracles" requires the produced tape to be at their station no later than 10 days before the show is to air, which I am hardly able to make because of my part time availability. Because of Sky Angel's deadline it is very time consuming to edit and send the program to a closed caption company. The time it takes to receive the program back to proof it would cause Channel of Love Ministries to miss their airing deadline.

Sincerely,

  
Diane Johnson

Go ye into all the world and preach the gospel.

9:57 PM

05/11/06

Accrual Basis

**Channel of Love Ministries International**  
**Profit & Loss**  
 January through December 2005

Attachment 5  
Pg 1

	Jan - Dec 05
<b>Ordinary Income/Expense</b>	
Income	
Income	
Contributions	127,843.86
Interest	34.42
Total Income	127,878.28
<b>Total Income</b>	<b>127,878.28</b>
Expense	
Advertisement	812.50
Airline	4,003.99
Automobile Expense	11,980.67
Bank Service Charges	426.52
Books	429.82
Credit Protect	100.71
Dining	4,729.12
Dues and Subscriptions	45.00
Equipment	3,595.50
Gifts Given (Contributions)	15,471.39
Insurance	
Auto	2,110.67
Health	6,124.00
Liability Insurance	808.00
Total Insurance	9,042.67
Interest Expense	
Finance Charge	2,937.09
Interest Expense - Other	47.40
Total Interest Expense	2,984.49
Internet service	2,162.45
Licenses and Permits	50.00
Medical	880.97
Miscellaneous	-107.50
Mission	
Clothes	100.00
Lodging	300.00
Mission - Other	500.00
Total Mission	900.00
Office Supplies	5,075.25
Outreach	
books	0.00
clothes, etc.	0.00
food	475.49
toys	0.00
Outreach - Other	800.00
Total Outreach	1,275.49
Outside Labor	1,525.00
Postage and Delivery	7,210.75
Printing and Reproduction	2,475.30
Professional Fees	
Accounting	580.00
Total Professional Fees	580.00
Rent	3,100.00
Repairs	
Computer Repairs	354.40
Equipment Repairs	70.00
Total Repairs	424.40
Salary	9,100.00
Supplies	1,411.34
Taxes	2,013.55

MOST OF THIS IS  
FOR TV



9:57 PM

05/11/06

Accrual Basis

**Channel of Love Ministries International**  
**Profit & Loss**  
 January through December 2005

Attachment 5

Pg 2

	Jan - Dec 05
<b>Telephone</b>	
Prayer Line	1,853.49
Telephone - Other	4,833.95
<b>Total Telephone</b>	6,687.44
<b>Television</b>	
Crises Line Phones	2,207.91
Postage	416.63
Television - Other	11,952.04
<b>Total Television</b>	14,576.58
<b>Tent</b>	
Auto	1,458.64
Clothes	0.00
Food	1,980.89
Gifts	126.11
Lodging	192.13
Misc	203.04
Travel	137.66
Tent - Other	1,961.21
<b>Total Tent</b>	6,059.68
<b>Travel &amp; Ent</b>	
Entertainment	147.93
lodging	2,340.89
Travel	1,133.38
Travel & Ent - Other	6.53
<b>Total Travel &amp; Ent</b>	3,628.73
<b>Utilities</b>	
Firewood	453.30
Gas and Electric	887.98
Sewer	141.19
Water	413.51
<b>Total Utilities</b>	1,895.98
<b>Total Expense</b>	124,547.79
<b>Net Ordinary Income</b>	3,330.49
<b>Other Income/Expense</b>	
Other Expense	
Other Expenses	997.45
Void	0.00
<b>Total Other Expense</b>	997.45
<b>Net Other Income</b>	-997.45
<b>Net Income</b>	2,333.04

Q Attachment 5

12:07 PM

Channel of Love Ministries International

05/12/05

# Account QuickReport

Accrual Basis

As of December 31, 2005

Pg 3

## Balance

13,429.24  
12,929.24  
12,729.24  
12,129.24  
12,129.24  
13,910.20  
14,289.66  
14,589.70  
14,089.70  
13,589.70  
14,962.89  
14,762.89  
15,496.84  
15,641.13  
15,491.13  
14,991.13  
14,491.13  
13,491.13  
13,691.13  
15,570.45  
15,070.45  
14,770.45  
15,211.85  
15,211.85  
13,711.85  
12,911.85  
13,111.85  
14,315.44  
13,315.44  
12,315.44  
12,790.44  
13,872.54  
13,372.54  
12,972.54  
14,518.76  
13,718.76  
13,891.37  
13,191.37  
-2,783.63  
7,216.37  
13,727.50  
21,524.05  
20,824.05  
21,324.05  
22,877.19  
23,492.07  
23,192.07  
22,692.07  
24,571.23  
25,039.05  
24,539.05  
25,039.05  
24,539.05  
29,746.19  
29,985.61  
30,666.30  
31,286.30  
30,766.30  
36,086.30  
36,766.30  
36,266.30  
36,466.30  
35,766.30  
38,329.73  
38,829.73  
39,129.73  
39,329.73  
39,105.96

Beg. loan to owner

Attachment 5

12:07 PM

05/12/06

Accrual Basis

Channel of Love Ministries International  
Account QuickReport  
As of December 31, 2005

pg 4

Balance
39,483.19
40,401.45
36,901.45
36,950.15
37,573.30
37,873.30
38,004.70
38,023.70
38,602.54
39,221.76
39,397.97
39,397.97
39,397.97

ending  
Loan to owner

difference of \$25,968.73

12:20 PM

05/12/06

Accrual Basis

**Channel of Love Ministries International**  
**Expenses by Vendor Summary**  
 January 1 through May 12, 2006

Pg 5

Attachment 5

	Jan 1 - May 12, 06
AT&T	832.08
Bank of America - Visa	7,593.87
Barbara Reis	2,420.00
Bethel Bible College	550.00
Bill Ballinger	464.12
Campora Propane Service	222.42
Carrie Lemricks	12.00
Charles B Merrill Office Equip & Supplies	648.26
Chase Card Services	378.87
Citi-Card	613.32
Clear Creek Community Services District	151.07
Copy Right Printing	1,348.26
Costco	45.00
Cruz Reynero	95.00
Dianna Johnson	400.00
Discover	10.00
Dish Network	177.96
Dominion Foundation	200.00
Donna Woods	61.85
Durst Properties	1,750.00
Farmers Insurance	1,047.20
FreshFires International	275.00
Gospel Crusade	80.00
House of Refuge	-950.00
International Fellowship of Christian & J	150.00
Issues of Life Ministries	325.00
Joan Pearce-V	739.29
Kaiser Permanente	1,560.00
Lea Anna Bacon	144.38
Lifesat TV	300.00
Lori J Scott Treasurer Tax Collector	764.81
Mariana La Luz	250.00
Mary Jo-Kaiser	195.66
Merchant Account	70.00
N.T.C. Ministries	352.00
Nancy Widdifield	1,497.46
Pamela Thomas	350.00
PG&E	124.67
Postmaster	518.94
Qwest	655.25
Ray Rodriguez	190.00
Schembri Vision	1,000.00
Secretary of State	10.00
Sky Angel	149.90
TBN	200.00
TDS Telecom	249.77
Teresa Harris	100.00
Unknown	-1,167.00
<u>UPS</u>	<u>1,546.80</u>
Verizon Wireless	777.34
Waste Management of Anderson Cottonwood D	127.14
Windy Inman	120.00
Wings of Faith Missions	500.00
<b>TOTAL</b>	<b><u>30,227.69</u></b>

GENERAL AFFIDAVIT

State of California

County of Amador

Before me, the undersigned Notary, Lu Ella Fulton

on this 15th day of May, 2006, personally appeared Joan L Pearce, known to me to be a credible person and of lawful age, who being by me first duly sworn/affirm, on affirming her oath, deposes and says:

I, Joan L. Pearce do affirm that the information contained in this **Petition for**

**Exemption to the Closed Captioning Requirements on the Basis of Undue Burden**

to be true and accurate to the best of my knowledge.

Joan L Pearce

Joan L. Pearce  
P.O. Box 3007  
Redding, CA 96099  
Phone: 530-357-4711  
Cell: 530-515-5044  
e-mail: [revjpearce@aol.com](mailto:revjpearce@aol.com)

Subscribed and sworn/affirm to before me, this 15 day of May, 2006.

Proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Luella Fulton

